

SSS:HDM
F. #2014R02013

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 1958(a))

ANGEL CORDERO and EDUARDO RIOS
VELASQUEZ,

Defendants.

----- X

17M611

EASTERN DISTRICT OF NEW YORK, SS:

DENIS KENNEDY, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

CONSPIRACY TO COMMIT MURDER FOR HIRE

In or about and between June 2017 and July 2017, both dates being approximate and inclusive, within the District of New Jersey, the Northern District of Ohio and elsewhere, the defendants ANGEL CORDERO and EDUARDO RIOS VELASQUEZ, together with others, did knowingly and intentionally conspire to use and cause another to use a facility of interstate commerce, to wit: a telephone, with intent that the murder of Jane Doe be committed, in violation of the laws of the State of Ohio, as consideration for the receipt of, or as consideration for a promise and agreement to pay, things of pecuniary value.

(Title 18, United States Code, Section 1958(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous cases involving violence and narcotics trafficking. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendants' criminal history records; and from reports of other law enforcement officers involved in the investigation.

2. On June 29, 2017, law enforcement officials spoke to Cooperating Source ("CS"), an inmate at the Fort Dix Federal Correctional Institution in New Jersey. The CS told law enforcement officials in sum and substance and in part the following: (1) a fellow inmate, the defendant ANGEL CORDERO, put the CS in contact with the defendant EDUARDO RIOS VELASQUEZ; (2) VELASQUEZ offered to pay the CS money for Jane Doe's address; (3) CORDERO told the CS that VELASQUEZ wanted the address because he was working with another man, First Name Unknown, Last Name Unknown ("FNU LNU"), to locate Jane Doe in order to kill her; (4) CORDERO told the CS that VELASQUEZ had been hired to kill Jane Doe; (5) CORDERO and VELASQUEZ have been communicating by telephone about getting Jane Doe's address in order to kill Jane Doe; (6) CORDERO has a cellular telephone at Fort Dix ("Cordero Phone"), (7) the CS has used the Cordero Phone, including to speak with VELASQUEZ, about finding Jane Doe to kill her;

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

(8) VELASQUEZ's number begins with "702" and he just got this new number; and (9) VELASQUEZ is from Lorain, Ohio.

3. On or about June 30, 2017, law enforcement officials reviewed toll records for the Cordero Phone. The toll records showed that only one "702" number was called by the Cordero Phone in the past 30 days, 702-630-7045 ("Velasquez Phone"). Toll records showed that between June 29, 2017 and June 30, 2017, there were 21 calls between the Cordero Phone and the Velasquez Phone.

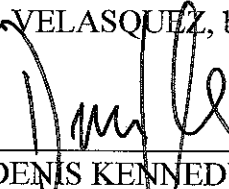
4. On or about July 1, 2017, United States Magistrate Judge Ramon Reyes of the United States District Court of the Eastern District of New York issued a search warrant for prospective cell-site information for the Velasquez Phone.

5. On or about July 3, 2017, using the prospective cell-site information, law enforcement officials located VELASQUEZ at 3453 Fulton Road, Cleveland, Ohio.

6. On or about July 7, 2017, CS spoke to law enforcement officials and stated in sum and substance and in part that (1) CORDERO confirmed that he and the CS would get paid if the CS provided Jane Doe's address to VELASQUEZ; (2) VELASQUEZ confirmed that the CS would get paid if he provided Jane Doe's address; and (3) the CS provided a fake address for Jane Doe.

7. On or about July 7, 2017, law enforcement officials observed, based on prospective cell-site information for the Velasquez Phone, that the Velasquez Phone was moving toward the direction of the fake address.

WHEREFORE, your deponent respectfully requests that the defendants
ANGEL CORDERO and EDUARDO RIOS-VELASQUEZ, be dealt with according to law.



DENIS KENNEDY
Special Agent, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
7th day of July 2017



THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK